

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VIAMEDIA, INC.,
Plaintiff,

v.

COMCAST CORPORATION and
COMCAST CABLE COMMUNICATIONS
MANAGEMENT, LLC,
Defendants.

No. 16 C 5486

Hon. Charles R. Norgle, Sr.

Hon. Sheila M. Finnegan,
Magistrate Judge

**COMCAST’S MOTION TO FILE UNDER SEAL EXHIBIT B
TO ITS MOTION TO COMPEL INTERROGATORY RESPONSES**

Defendants Comcast Corporation and Comcast Cable Communications Management, LLC (collectively “Comcast”) respectfully move the Court for leave to file Exhibit B to its Motion to Compel Interrogatory Responses under seal, pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 26.2.

In support thereof, Comcast states as follows:

1. Today, April 29, 2022, Comcast filed its Motion to Compel Interrogatory Responses. The Motion attaches Exhibit B, which Viamedia has designated as confidential. Accordingly, under the Protective Order in this Case, Dkt. 44, and pursuant to Local Rule 26.2(c), Comcast has provisionally filed Exhibit B to the Motion to Compel Interrogatory Responses under seal.

2. As the Seventh Circuit has recognized, a Court may keep documents or portions thereof under seal if “there is good cause for sealing a part or the whole of the record.” *Citizens First Nat’l Bank of Princeton v. Cincinnati Ins. Co.*, 178 F.3d 943, 945 (7th Cir. 1999); *see also*

Local Rule 26.2(b) (applying “good cause” standard). Accordingly, the Court may seal filings if there are “legitimate concerns of confidentiality,” *Grove Fresh Dist., Inc. v. Everfresh Juice Co.*, 24 F.3d 893, 898 (7th Cir. 1994), such as where the information in question “meet[s] the definition of trade secrets or other categories of bona fide long-term confidentiality,” *Baxter Intern., Inc. v. Abbott Labs.*, 297 F.3d 544, 545 (7th Cir. 2002).

3. Here, Viamedia has designated Exhibit B to Comcast’s Motion to Compel Interrogatory Responses as confidential. This presents a legitimate concern of confidentiality and gives good cause to file Exhibit B under seal.

WHEREFORE, Comcast respectfully requests the Court enter an order granting it leave to file Exhibit B to its Motion to Compel Interrogatory Responses under seal.

Dated: May 2, 2022

Respectfully submitted,

COMCAST CORPORATION AND
COMCAST CABLE COMMUNICATIONS
MANAGEMENT, LLC

/s/ Ross B. Bricker

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CERTIFICATE OF SERVICE

I, Ross B. Bricker, an attorney, certify that on May 2, 2022, I caused **Comcast's Motion to File Under Seal Exhibit B to Its Motion to Compel Interrogatory Responses** to be served on all counsel of record listed via the Court's ECF system.

/s/ Ross B. Bricker